

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
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In re: BED BATH & BEYOND INC., <i>et al.</i> , ¹ Debtors.	Case No.: 23-13359 (VFP) Chapter 11

**CERTIFICATE OF NO OBJECTION WITH RESPECT TO APPLICATION OF
MICHAEL GOLDBERG, AS PLAN ADMINISTRATOR, IN LIEU OF MOTION WITH
SUPPORTING LAW AND FACTS IN SUPPORT OF ENTRY OF STIPULATION AND
CONSENT ORDER BETWEEN PLAN ADMINISTRATOR AND IRON MOUNTAIN**

[DOCUMENT NO. 3989]

1. On April 21, 2025, Michael Goldberg as plan administrator for the above-captioned debtors and debtors in possession filed an *Application in Lieu of Motion with Supporting Law and Facts in Support of Entry of Stipulation and Consent Order Between Plan Administrator and Iron Mountain* (the “Application”) [ECF No. 3989] and *Certification Concerning Proposed Order* [ECF No. 3990].

2. On April 21, 2025, the Application was served upon the parties listed on the *Certificate of Service* [ECF No. 3991].

¹ The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of Debtors in these chapter 11 cases and each such Debtor’s tax identification number may be obtained on the website of Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.’s principal place of business and Debtors’ service address in these chapter 11 cases is 650 Liberty Avenue, Union, New Jersey 07083

3. The deadline for parties to file objections and responses to the Application was April 28, 2025 (the “Objection Deadline”). No objections or responses to the Application were filed on the docket on or before the Objection Deadline. Counsel to the Plan Administrator did not receive any other informal responses on or before the Objection Deadline.

3. The proposed *Stipulation and Consent Order Resolving Certain Obligations* (the “Proposed Order”) that was appended to the Application is attached hereto as **Exhibit A**. The Plan Administrator respectfully requests that the Court enter the attached Proposed Order at the earliest convenience of the Court.

Dated: New York, New York
April 30, 2025

AKERMAN LLP

By: /s/Mark S. Lichtenstein
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